

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

No. 20 Civ. 7311 (LAK)

PROPOSED VERDICT FORM

Defamation

Did Ms. Carroll prove, by a preponderance of the evidence, that

1. Ms. Carroll was injured as a result of Mr. Trump's publication of the June 21, 2019 statement?

YES _____ NO _____

If "Yes," insert a dollar amount for any compensatory damages.

\$ _____

If "No," insert \$1.

\$ _____

[Continue to Question 2, whether you answered "Yes" or "No"]

2. Ms. Carroll was injured as a result of Mr. Trump's publication of the June 22, 2019 statement?

YES _____ NO _____

If "Yes," insert a dollar amount for any compensatory damages.

\$ _____

If “No,” insert \$1.

\$ _____

[Continue to Question 3, whether you answered “Yes” or “No”]

Did Ms. Carroll prove, by clear and convincing evidence that

3. In making the June 21, 2019 statement and/or the June 22, 2019 statement, Mr. Trump acted maliciously and was solely motivated by hostility and a desire to injure Ms. Carroll?

YES _____ NO _____

If “Yes,” how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ _____

Dated: _____, 2023.